

July 25, 2022

**VIA ECF**

The Honorable Sarah L. Cave  
United States District Court for the Southern District of New York  
500 Pearl St.  
New York, NY 10007

*Catherine McKoy, et al. v. Trump Corp., et al.*, 1:18-cv-9936 (LGS-SLC)

Dear Judge Cave:

The parties submit this joint letter pursuant to the Court's July 15, 2022 Order, ECF No. 445, and further to the parties' July 14, 2022 joint update, ECF No. 444, concerning the status of the parties' compliance with the Court's May 18, 2022 Order, ECF No. 424.

*First*, the parties are pleased to report that they have reached an agreement in principle concerning partial production of exhibits to the Trump University deposition transcripts that addresses Defendants' concerns with respect to the protective order.

*Second*, the parties have continued to take party and non-party depositions. For reasons largely outside the parties' control, certain deposition dates have been rescheduled, by agreement of the parties. The parties are working diligently and cooperatively to complete all depositions, mindful of the current August 31 deadline. The parties anticipate needing a short extension to complete all party and non-party depositions, and expect to bring that issue to the Court jointly and promptly.

*Third*, as previously reported, Defendants have designated two individuals to testify on behalf of Defendant The Trump Organization, pursuant to Rule 30(b)(6). The parties are continuing to meet and confer concerning the scope of the Rule 30(b)(6) deposition and will bring any issues to the Court's attention as they arise.

Respectfully submitted,

/s/ Roberta A. Kaplan

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